

**REMARKS**

Claims 1-28 stand in the present application. Reconsideration and favorable action is respectfully requested in view of the following remarks.

In the Office Action, the Examiner has rejected claims 1-21 and 23-28 under 35 U.S.C. § 102(b) as being anticipated by Madrane, and has rejected claim 22 under 35 U.S.C. § 103(a) as being unpatentable over Madrane. Applicants respectfully traverse the Examiner's §§ 102 and 103 rejections of the claims.

The Examiner is interpreting "media object," as used in the cited art, to mean an element of an image, typically one that persists from one frame to another in a video sequence, such as a representation of an object – for example, a person. Such objects are of course merely representations of real objects. Madrane seems to be concerned with tracking the movement of such objects across the field of view in the virtual space depicted in the images. Although they typically represent physical objects such as people, the objects themselves have no physical existence, which is what makes them difficult to track from each image to the next.

In the present application, "media objects" are more substantial, insofar as they have a real physical existence, albeit typically as computer files or other stored data which can be organized, stored and retrieved. It should be noted that the present specification define the term "media file" in the introduction as distinct from "media object" and defines the term "media object" to embrace both actual media files and metadata objects identifying such files. See, present specification at page 1, lines 27-30. This definition alone distinguishes Applicant's invention from the type of media object discussed in the prior art reference.

Turning to the claim rejections, the Examiner discusses the "means to allow . . . a representation of a selected media object . . . to be selectively moved by a user into a region of the display . . . representing a selected set of metadata tags . . . " See, Office Action at page 3. It is apparent from the passages quoted by the Examiner (i.e., cols. 12-13, col. 30; and Figs 17, 18) that the metadata tags move with the objects – the display does not have different regions allotted to different tags or sets of tags, as required by the present claims: "moved by a user into a region of the display representing a selected set of metadata tags." In the prior art, the tag stays with the object however it is moved across the display. Nowhere does Madrane teach adding tags to the object based on where the object is placed in the display. In Applicants' invention, tags are added to objects according to where the objects are placed in the display area.

The Examiner's comments in this regard seem to miss the point – the tags applied to an individual object in the prior art represent the location of that object in the virtual three-dimensional world represented in the display which may in turn affect how that object is displayed if the view of the display is changed (e.g., objects tagged as distant may be omitted from a zoomed-in image, as they would be off-screen). However, this is not what is claimed. Applicants' claimed invention requires the objects to be tagged according to where the user places them in the display itself – i.e., which "bins" the data file is placed in.

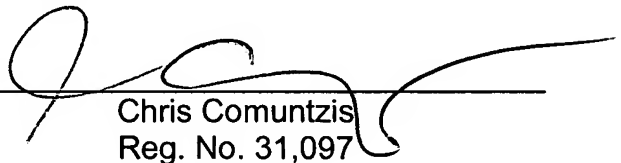
Accordingly, the present claims patentably define over Madrane.

Therefore, in view of the above remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-28, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

Respectfully submitted,

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